

1 || MALCOLM S. SEGAL - 075481
2 || KIMBERLY A. URIE - 133992
3 || SEGAL & KIRBY
4 || 770 L Street, Suite 1440
5 || Sacramento, CA 95814
6 || Telephone: (916) 441-0828
7 || Facsimile: (916) 446-6003

5 || Attorneys for Defendant
FRANCES MORADA

OK/HAV

11 UNITED STATES OF AMERICA. CASE NO. S-03-376-DFL

12 Plaintiff, **STIPULATION AND PROPOSED**
13 **ORDER REGARDING STATUS**
CONFERENCE CONTINUANCE

vs.

15 FRANCES MORADA,
LILY MIZRAHE

16 Defendants.

CASE NO. S-03-376-DFL

STIPULATION AND PROPOSED ORDER REGARDING STATUS CONFERENCE CONTINUANCE

Defendant Frances Morada, through her counsel of record, Malcolm Segal
Defendant Lily Mizrahe, through her counsel of record, Bruce Locke, and plaintiff
United States of America, through its counsel, Assistant United States Attorney
Daniel S. Linhardt, agree and stipulate that the status conference set for July 14,
2005 may be continued to September 15, 2005 at 10:00 AM, in order to permit the
parties to further investigate, review and discuss the case regarding future
proceedings. This case continues to be complex within the meaning of the Speedy
Trial Act due to the volume of discovery, complexity of the legal and factual issues,
and the need of counsel to conduct independent investigations.

Accordingly, the time between the scheduled court appearance on July 14, 2005 and the status conference on September 15, 2005 should continue to be

1 excluded from the calculation of time pursuant to the Speedy Trial Act, due to
2 complexity and counsels' need to prepare. 18 U.S.C. §3161 (h) (8) (B) (ii) and (iv)
3 [Local Codes T2/T4].

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5 Dated: July 11, 2005

SEGAL & KIRBY

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By: /s/ Malcolm S. Segal

MALCOLM S. SEGAL

Counsel for Defendant Frances Morada

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11 Dated: July 11, 2005

MOSS & LOCKE

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By: /s/ Bruce Locke

BRUCE LOCKE

Counsel for Defendant Lily Mizrahe

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18 Dated: July 11, 2005

19 By: /s/ Daniel S. Linhardt

DANIEL S. LINHARDT

20 Assistant United States Attorney

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22 **IT IS SO ORDERED.**

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24 Dated: 7/15/2005

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DAVID F. LEVI
Chief United States District Judge